

**EXHIBIT 13**

**FILED UNDER SEAL**

HENRY MIROLYUZ - 07/31/2018

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF MINNESOTA  
3 CASE NO. 16-CV-1054 (WMW/DTS)  
4 - - - - -  
5 FAIR ISAAC CORPORATION, a Delaware corporation,  
6 Plaintiff,  
7 vs.  
8 FEDERAL INSURANCE COMPANY, an Indiana corporation,  
9 Defendant.  
10 - - - - -  
11  
12 TRANSCRIPT of the stenographic notes of  
13 the 30(b)(6)videotaped deposition of Henry Mirolyuz in  
14 the above-entitled matter, as taken by and before  
15 LORRAINE B. ABATE, a Certified Court Reporter and  
16 Notary Public of the State of New Jersey and  
17 Registered Professional Reporter, held at the offices  
18 of Regus, 55 Madison Avenue, Morristown, New Jersey,  
19 on Tuesday, July 31, 2018, commencing at 9:10 a.m.,  
20 pursuant to Notice.  
21  
22  
23  
24 Job No. MP-182592  
25 Pages: 1 - 80

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Pages 2..5

<p style="text-align: right;">Page 2</p> <p>1 A P P E A R A N C E S:</p> <p>2 MERCHANT &amp; GOULD, ESQS.</p> <p>3 Attorneys for the Plaintiff</p> <p>4 80 South Eighth Street</p> <p>5 Minneapolis, Minnesota 55402-2215</p> <p>6 BY: ALLEN W. HINDERAKER, ESQ.</p> <p>7 (612)371-5292</p> <p>8 ahinderaker@merchantgould.com</p> <p>9 FREDRIKSON &amp; BYRON, P.A.</p> <p>10 Attorneys for the Defendant</p> <p>11 200 South Sixth Street, Suite 4000</p> <p>12 Minneapolis, MN 55402-1425</p> <p>13 BY: TERRENCE J. FLEMING, ESQ.</p> <p>14 (612)492-7496</p> <p>15 tfleming@fredlaw.com</p> <p>16 -and-</p> <p>17 Chubb Insurance Company</p> <p>18 202A Halls Mill Road</p> <p>19 Whitehouse, NJ 08889</p> <p>20 BY: KEVIN MURPHY, ESQ.</p> <p>21 (908) 903-3726</p> <p>22 kevinmurphy@chubb.com</p> <p>23 A L S O P R E S E N T:</p> <p>24 James Woodward</p> <p>25 Marcelo Rivera, Videographer</p>	<p style="text-align: right;">Page 4</p> <p>1 E X H I B I T S</p> <p>2 (CONTINUED)</p> <p>3 EXHIBIT PAGE</p> <p>4 15 Surety Information System Slide Deck 69</p> <p>5 16 Chubb Arch PLD Project Statement of Work 72</p> <p>6</p> <p>7 * * * * *</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 I N D E X</p> <p>2</p> <p>3</p> <p>4 WITNESS EXAMINATION BY PAGE</p> <p>5 Henry Mirolyuz Mr. Hinderaker 7</p> <p>6</p> <p>7</p> <p>8</p> <p>9 E X H I B I T S</p> <p>10 EXHIBIT PAGE</p> <p>11 1 Second Amended Notice of Deposition 5</p> <p>12 2 Resume 13</p> <p>13 3 E-Mail Chain 32</p> <p>14 4 E-Mail Chain 41</p> <p>15 5 E-Mail dated July 29, 2013 45</p> <p>16 6 Second Supplemental Answers to</p> <p>17 Interrogatories Nos. 2, 3 and 4 51</p> <p>18 7 E-Mail Chain 53</p> <p>19 8 E-Mail Chain 57</p> <p>20 9 E-Mail dated May 5, 2011 57</p> <p>21 10 E-Mail Chain 61</p> <p>22 11 E-Mail dated June 18, 2012 63</p> <p>23 12 E-Mail Chain 64</p> <p>24 13 E-Mail Chain 67</p> <p>25 14 Meeting Invite 68</p>	<p style="text-align: right;">Page 5</p> <p>1 (Exhibit 1, Second Amended Notice of</p> <p>2 Deposition, marked for identification, as of this</p> <p>3 date.)</p> <p>4 THE VIDEOGRAPHER: This is the digitized</p> <p>5 deposition video of Mr. Henry Mirolyuz in the matter</p> <p>6 of Fair Isaac Corporation, a Delaware corporation,</p> <p>7 versus Federal Insurance Company, an Indiana</p> <p>8 corporation.</p> <p>9 This deposition is being held at Regus</p> <p>10 located at 55 Madison Avenue, suite 400 in</p> <p>11 Morristown, New Jersey on July 31st, 2018 at</p> <p>12 approximately 9:10 a.m. My name is Marcelo Rivera</p> <p>13 from the firm of Epiq and I'm the legal video</p> <p>14 specialist. The court reporter is Lorraine Abate,</p> <p>15 also with Epiq.</p> <p>16 All present counsel, please introduce</p> <p>17 themselves for the record.</p> <p>18 MR. HINDERAKER: On behalf of Fair Isaac</p> <p>19 Corporation, Allen Hinderaker of Merchant &amp; Gould,</p> <p>20 and James Woodward of FICO.</p> <p>21 MR. FLEMING: Terry Fleming of</p> <p>22 Fredrikson Law firm representing Federal Insurance</p> <p>23 Company. With me is Kevin Murphy, general counsel,</p> <p>24 Chubb.</p> <p>25 THE VIDEOGRAPHER: Will the court</p>

<p style="text-align: right;">Page 22</p> <p>1 providers means. Is that part of it?</p> <p>2 A. It's a functionality of the Blaze</p> <p>3 Advisor software which allows creation of customized</p> <p>4 screens for the end users.</p> <p>5 Q. And so you were part of the design or</p> <p>6 architecture of those, of what those customized</p> <p>7 screens would be?</p> <p>8 A. Correct. Components, yes.</p> <p>9 Q. And this bullet point, as you see from</p> <p>10 the document for the time frame 2006 to 2008, it</p> <p>11 talks about automated renewal process 1, ARP1.</p> <p>12 A. Correct. It's automated part 1.</p> <p>13 Q. And just a few moments ago, you were</p> <p>14 talking -- you identified ARP2.</p> <p>15 A. Correct.</p> <p>16 Q. Are those the same project, part 1, part</p> <p>17 2?</p> <p>18 A. Part 2, yes. Subsequent implementation.</p> <p>19 Q. So thank you for that, your background.</p> <p>20 Let me turn to a series of questions</p> <p>21 that are really all around the physical location of</p> <p>22 servers on which Blaze Advisor is installed that --</p> <p>23 maybe I should just sort of back up for somebody's</p> <p>24 benefit, I guess, that first, Blaze Advisor is</p> <p>25 software licensed from the Chubb, once upon a time</p>	<p style="text-align: right;">Page 24</p> <p>1 servers are located.</p> <p>2 Q. What do you mean -- I'm sorry, servers</p> <p>3 allocated?</p> <p>4 A. Servers are located.</p> <p>5 Q. I don't understand what you mean by</p> <p>6 allocated.</p> <p>7 A. No, located. Location.</p> <p>8 Q. Located.</p> <p>9 A. At some point of time, servers changed.</p> <p>10 That could change location, and I would not be --</p> <p>11 this information would not be provided to me.</p> <p>12 Q. All right. All right. Well, let's talk</p> <p>13 about the United States.</p> <p>14 In the United States, do you know where</p> <p>15 Blaze Advisor software is installed on servers?</p> <p>16 A. Yes. They are located in Chubb data</p> <p>17 center in North Carolina.</p> <p>18 Q. And when you say Chubb data center, is</p> <p>19 it more accurate to say the data center of Chubb &amp;</p> <p>20 Son, a Division of Federal?</p> <p>21 A. I would not be able to comment on that.</p> <p>22 From my perspective, it's Chubb.</p> <p>23 Q. Okay. So whether technically it's Chubb</p> <p>24 &amp; Son, a Division of Federal, or it's Chubb or is</p> <p>25 Federal, that's beyond your knowledge?</p>
<p style="text-align: right;">Page 23</p> <p>1 licensed from FICO, correct?</p> <p>2 A. Correct.</p> <p>3 Q. And the Blaze Advisor software resides</p> <p>4 on what's called servers, correct?</p> <p>5 A. Correct.</p> <p>6 Q. And I would appreciate your more -- your</p> <p>7 definition of a server. What is a server?</p> <p>8 A. It's a machine located -- not assigned</p> <p>9 to a specific individual, and accessible by one or</p> <p>10 many developers or parties, depends on the rights and</p> <p>11 also, the authorization provided by Chubb.</p> <p>12 Q. Okay. And when you say a server is a</p> <p>13 machine, is it a computer?</p> <p>14 A. Computer.</p> <p>15 Q. And of course, computers reside at</p> <p>16 physical locations?</p> <p>17 A. Correct.</p> <p>18 Q. So does Blaze Advisor software -- well,</p> <p>19 where does Blaze Advisor software -- where do the</p> <p>20 servers -- where are the servers located on which</p> <p>21 Blaze Advisor software is installed?</p> <p>22 A. I would not be privy for such</p> <p>23 information. I know they are located -- it depends</p> <p>24 on the geographical zone. However, it was not my</p> <p>25 responsibility to know and understand where the</p>	<p style="text-align: right;">Page 25</p> <p>1 A. That's beyond my knowledge.</p> <p>2 Q. Is Blaze Advisor -- in the United</p> <p>3 States, is Blaze Advisor software installed on</p> <p>4 servers located anywhere else?</p> <p>5 A. Not to the best of my knowledge.</p> <p>6 Q. Did you inquire of, interview people, to</p> <p>7 understand that better?</p> <p>8 A. I did.</p> <p>9 Q. And so based upon your best knowledge</p> <p>10 following your investigation, the only place you know</p> <p>11 that the Blaze Advisor software is installed is in</p> <p>12 North Carolina?</p> <p>13 A. Correct.</p> <p>14 Q. What city?</p> <p>15 A. I believe it's Raleigh.</p> <p>16 Q. And just to be I guess very clear about</p> <p>17 it, to your personal knowledge but more particularly</p> <p>18 to your status here as a 30(b)(6) witness, following</p> <p>19 the investigation, that's the only location in the</p> <p>20 United States on which -- or at which Blaze Advisor</p> <p>21 software is installed?</p> <p>22 A. Based on my knowledge and conversation</p> <p>23 with other people, yes.</p> <p>24 Q. So then how about outside the United</p> <p>25 States; is Blaze Advisor installed on servers outside</p>

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<p style="text-align: right;">Page 26</p> <p>1 of the United States?</p> <p>2 A. Based on my conversation, yes, it was.</p> <p>3 Q. Okay. So let's take it -- if there is</p> <p>4 more than one, we'll take it one by one.</p> <p>5 Outside of the United States, where are</p> <p>6 servers located on which Blaze Advisor software is</p> <p>7 installed?</p> <p>8 A. The servers, based on my conversation,</p> <p>9 servers located in United Kingdom.</p> <p>10 Q. Is that -- do you know if they're in</p> <p>11 London or some place else?</p> <p>12 A. I don't know.</p> <p>13 Q. Okay.</p> <p>14 A. And I don't have this information. I</p> <p>15 was only provided the fact that it's located in --</p> <p>16 the information that the server is located in United</p> <p>17 Kingdom.</p> <p>18 Q. All right. What other country?</p> <p>19 A. There is -- initially, the servers were</p> <p>20 Canada, were hosting the Blaze Advisor. However,</p> <p>21 they may also be consolidated at this point of time</p> <p>22 to the North America, to the United States or</p> <p>23 application were migrated to the North America</p> <p>24 servers.</p> <p>25 Q. Are you saying maybe?</p>	<p style="text-align: right;">Page 28</p> <p>1 the application, copying of the application from one</p> <p>2 server to another.</p> <p>3 Q. Did you use the word capping?</p> <p>4 A. Copying, copying.</p> <p>5 Q. Copying. All right. And when the</p> <p>6 process of migration is complete, then will Blaze</p> <p>7 Advisor be still installed on any servers in Canada?</p> <p>8 A. It will not be.</p> <p>9 Q. Do you know when the process of</p> <p>10 migration began?</p> <p>11 A. I don't have this information.</p> <p>12 Q. Did it come to you as part of the</p> <p>13 interviews, apparently?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Do you know if the process of</p> <p>16 migration was post-merger?</p> <p>17 A. I believe so, but I don't know that for</p> <p>18 the fact.</p> <p>19 Q. Did you get any information as to a goal</p> <p>20 for the end date when the process of migration is</p> <p>21 complete?</p> <p>22 A. There was no goal in particular or at</p> <p>23 least I was not told the goal was to consolidate all</p> <p>24 the assets in one data center for the North America.</p> <p>25 Q. Did you say assets?</p>
<p style="text-align: right;">Page 27</p> <p>1 A. Potentially, yes.</p> <p>2 Q. Do you know one way or the other?</p> <p>3 A. I know there is a process of migration.</p> <p>4 I'm not sure if migration has been complete or not.</p> <p>5 I'm not involved in that area.</p> <p>6 Q. Okay. This is something you learned as</p> <p>7 part of your interviews?</p> <p>8 A. Interviews.</p> <p>9 Q. All right. We'll go back to the U.K.</p> <p>10 after. Let's finish this Canada off.</p> <p>11 Your understanding after interviews</p> <p>12 testifying here on behalf of the company is that</p> <p>13 Blaze Advisor has been installed on servers in</p> <p>14 Canada, correct?</p> <p>15 A. Correct.</p> <p>16 Q. Whether the Blaze Advisor software is</p> <p>17 still on Canadian servers is something you do not</p> <p>18 know one way or the other?</p> <p>19 A. Correct.</p> <p>20 Q. You are testifying that there is a</p> <p>21 process in place for migration to the United States,</p> <p>22 correct?</p> <p>23 A. Correct.</p> <p>24 Q. And what does migration mean?</p> <p>25 A. It's relocation of the -- or copying of</p>	<p style="text-align: right;">Page 29</p> <p>1 A. Assets, all the applications. All the</p> <p>2 applications in one data center.</p> <p>3 Q. All right. So you just used the phrase</p> <p>4 to get the applications in one data center.</p> <p>5 What is an application?</p> <p>6 A. It's a software which allows user to</p> <p>7 perform specific functions. Depends on the</p> <p>8 components of the application.</p> <p>9 Q. And is an application something that</p> <p>10 you, as the -- in your role on the technical side,</p> <p>11 you were involved in designing the architecture for</p> <p>12 those applications?</p> <p>13 A. Part of the architecture.</p> <p>14 Q. Part of it. All right.</p> <p>15 At least the Blaze Advisor part of it?</p> <p>16 A. Correct.</p> <p>17 Q. So you're making a distinction between</p> <p>18 the Blaze Advisor software and an application that</p> <p>19 uses Blaze Advisor?</p> <p>20 A. That is correct.</p> <p>21 Q. Staying with Canada, when the Blaze</p> <p>22 Advisor software is installed on servers in Canada --</p> <p>23 it was true that the applications that used Blaze</p> <p>24 Advisor -- certain applications that employed Blaze</p> <p>25 Advisor were used in Canada?</p>

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<p style="text-align: right;">Page 30</p> <p>1 A. Correct.</p> <p>2 Q. And do you know if that was used by the</p> <p>3 Chubb Insurance Company of Canada?</p> <p>4 A. Yes, correct.</p> <p>5 Q. So Blaze Advisor software and the</p> <p>6 applications that used Blaze Advisor were installed</p> <p>7 on servers in Canada to support the Canadian use of</p> <p>8 certain applications?</p> <p>9 A. That's absolutely correct.</p> <p>10 Q. And then when the migration process is</p> <p>11 completed, if it is, how will, as your understanding</p> <p>12 for the company, how will the Chubb Insurance Company</p> <p>13 of Canada -- will the insurance -- let me ask a</p> <p>14 different question. Your understanding is that these</p> <p>15 applications that the Insurance Company of Canada has</p> <p>16 used, will they continue to be able to use those</p> <p>17 applications after the migration?</p> <p>18 A. I believe so.</p> <p>19 Q. Okay. So whoever is the user in Canada</p> <p>20 will access that software through servers located in</p> <p>21 North Carolina?</p> <p>22 A. Correct.</p> <p>23 Q. So the migration includes the Blaze</p> <p>24 Advisor software and all of the applications used in</p> <p>25 Canada?</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Was it ever installed on servers in</p> <p>2 Australia?</p> <p>3 A. Not to my knowledge.</p> <p>4 Q. All right. To your knowledge, has the</p> <p>5 applications using Blaze Advisor software been used</p> <p>6 by people in Australia to sell insurance?</p> <p>7 A. Not to my knowledge as well.</p> <p>8 Q. All right. Good. That will help. We</p> <p>9 will return to that.</p> <p>10 Anywhere else in the world that you know</p> <p>11 of Blaze Advisor software has been installed on</p> <p>12 servers?</p> <p>13 A. No, I don't. I don't know. I'm not</p> <p>14 aware of any other location where the Blaze Advisor</p> <p>15 is installed.</p> <p>16 MR. HINDERAKER: Would you mark that,</p> <p>17 please.</p> <p>18 (Exhibit 3, E-Mail Chain, marked for</p> <p>19 identification, as of this date.)</p> <p>20 Q. Sir, the court reporter has handed you</p> <p>21 what we marked as Exhibit 3, and you identified that</p> <p>22 as an e-mail from yourself to a Richard Johnson and</p> <p>23 others dated May 26, 2009, the top heading.</p> <p>24 A. Correct.</p> <p>25 Q. And I have a few questions on it, but</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Correct.</p> <p>2 Q. Okay. Now, let's go back to the U.K.</p> <p>3 So in the U.K., there would be -- in the</p> <p>4 U.K., there is Blaze Advisor software installed on</p> <p>5 servers in the U.K.?</p> <p>6 A. Correct.</p> <p>7 Q. And then are the applications that use</p> <p>8 Blaze Advisor software also installed on the servers</p> <p>9 in the U.K.?</p> <p>10 A. That's correct.</p> <p>11 Q. And so whoever are the users and whoever</p> <p>12 used that software and applications from those</p> <p>13 servers, access or not, from the U.K. servers?</p> <p>14 A. That's correct.</p> <p>15 Q. And do you know it's the Chubb Insurance</p> <p>16 Company of Europe SE that uses the Blaze Advisor</p> <p>17 software and those applications on software being</p> <p>18 installed in the U.K.?</p> <p>19 A. I'm not sure about the exact name, but I</p> <p>20 believe that's correct.</p> <p>21 Q. Is Blaze Advisor software installed on</p> <p>22 servers in Australia?</p> <p>23 A. Not to the my knowledge in any people I</p> <p>24 talk to. Don't believe it was installed in the</p> <p>25 servers in Australia.</p>	<p style="text-align: right;">Page 33</p> <p>1 please, my questions are really limited to the first</p> <p>2 page, but take whatever time you want to familiarize</p> <p>3 yourself with it and then I'll ask.</p> <p>4 A. Please.</p> <p>5 Q. Okay. Great.</p> <p>6 Who is Richard D. Johnson?</p> <p>7 A. I believe he is -- if I remember</p> <p>8 correctly, he is a developer who was responsible for</p> <p>9 working with Blaze Advisor in European zone,</p> <p>10 specifically in London.</p> <p>11 Q. In London. Okay. And again, by the</p> <p>12 way, when you say developer, that's the same thing as</p> <p>13 saying somebody who writes code?</p> <p>14 A. Correct.</p> <p>15 Q. And you say "Hi, Richard." Then you say</p> <p>16 "I am sending you a link to a BR CoE Wiki site."</p> <p>17 What is a BR CoE Wiki site?</p> <p>18 A. It's business rule center of excellence</p> <p>19 Wikipedia site. It's a website created to provide</p> <p>20 the information regarding the Blaze Advisor.</p> <p>21 Q. Is this an internal website to Chubb?</p> <p>22 A. Correct.</p> <p>23 Q. No external access to that website,</p> <p>24 correct?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. And why did you send him a link with the</p> <p>2 download location and instructions for Blaze Advisor</p> <p>3 6.7?</p> <p>4 A. In looking at the e-mail and refreshing</p> <p>5 my memory, he was looking to create a POC or product</p> <p>6 type of using Blaze Advisor software, and he asked me</p> <p>7 to provide him the installation files as well as some</p> <p>8 documentation regarding the usage of such software.</p> <p>9 Q. Okay. Is it fair to characterize what</p> <p>10 you just said as saying he was working on proof of</p> <p>11 concept for an application that used Blaze Advisor</p> <p>12 software?</p> <p>13 A. He was working on the -- Richard was</p> <p>14 working on that.</p> <p>15 Q. On that?</p> <p>16 A. Yeah. I was not.</p> <p>17 Q. Was Richard part of Chubb Insurance</p> <p>18 Company of Europe SE, do you know?</p> <p>19 A. Based on the e-mail address, yes. At</p> <p>20 least he was the person who -- let me rephrase that.</p> <p>21 He was granted the Chubb e-mail address.</p> <p>22 Q. Fair enough.</p> <p>23 And can we conclude that Blaze Advisor</p> <p>24 6.7 was installed on servers in the U.K.?</p> <p>25 A. No, we cannot based on this e-mail.</p>	<p style="text-align: right;">Page 36</p> <p>1 Advisor software on a U.K. server.</p> <p>2 A. The software will be installed, initial</p> <p>3 version, on the developer's laptop or workstation.</p> <p>4 Q. Let me back you up. When you say</p> <p>5 developer, you're talking about the person in the</p> <p>6 U.K.?</p> <p>7 A. Person in the U.K. So Richard in that</p> <p>8 particular case.</p> <p>9 Q. Okay. My question could be more</p> <p>10 precise.</p> <p>11 Where does that person get the Blaze</p> <p>12 software installed?</p> <p>13 A. He would get it by running the</p> <p>14 installation files provided in this link. He would</p> <p>15 get the software installed and he would provide the</p> <p>16 files created during the installation process to the</p> <p>17 release management team which is responsible for</p> <p>18 deploying application as a part of application to the</p> <p>19 servers.</p> <p>20 Q. What is a risk management team?</p> <p>21 A. The release.</p> <p>22 Q. Release.</p> <p>23 A. Release management.</p> <p>24 Q. Okay. So this is something that can be</p> <p>25 done or was done completely internal to Chubb?</p>
<p style="text-align: right;">Page 35</p> <p>1 This e-mail just only speaks about the software for</p> <p>2 development use.</p> <p>3 Q. Okay. As we've mentioned already, you</p> <p>4 do know that Blaze Advisor software was installed on</p> <p>5 servers in the U.K.?</p> <p>6 A. Correct, but based on this e-mail -- my</p> <p>7 statement is that based on this e-mail, we cannot</p> <p>8 conclude if -- the way it was or was not installed.</p> <p>9 Q. I understand.</p> <p>10 A. This is just a link to the installation</p> <p>11 files.</p> <p>12 Q. I understand. So are we taking, to be</p> <p>13 clear, that whether Blaze Advisor software was</p> <p>14 installed using that link at this time or was not</p> <p>15 installed using -- or was not installed, you can't</p> <p>16 say one way or the other?</p> <p>17 A. Based on his e-mail, no, I cannot.</p> <p>18 Q. Understood.</p> <p>19 And as a matter of your knowledge and</p> <p>20 your interviews, do you know the first date that</p> <p>21 Blaze Advisor software was installed on servers in</p> <p>22 the U.K.?</p> <p>23 A. I do not.</p> <p>24 Q. Okay. Would you run me through the</p> <p>25 process by which someone in the U.K. installs Blaze</p>	<p style="text-align: right;">Page 37</p> <p>1 A. Correct.</p> <p>2 Q. It's accurate to say there is no</p> <p>3 involvement of FICO personnel in this process of</p> <p>4 installing Blaze Advisor on servers in the U.K.?</p> <p>5 A. They could assist with, could have</p> <p>6 assisted with any troubleshooting or any potential</p> <p>7 issues. So once again, I can't say one way or</p> <p>8 another. Each case-by-case basis. So they could</p> <p>9 have been -- if there was an issue, FICO could have</p> <p>10 been involved and helped, as any vendor, with</p> <p>11 troubleshooting or installing the software.</p> <p>12 Q. So are you aware of any instance where</p> <p>13 FICO was called in to help with the trouble -- help</p> <p>14 troubleshoot or address an issue on a U.K.</p> <p>15 installation of Blaze Advisor?</p> <p>16 A. I believe so. I believe -- that was</p> <p>17 based on my conversation with developers, FICO</p> <p>18 actually provided assistance with installing the</p> <p>19 software.</p> <p>20 Q. And with whom did you have that</p> <p>21 conversation?</p> <p>22 A. David Gibbs as well as the conversation</p> <p>23 with the developers back at that time, and as well as</p> <p>24 conversation with the FICO representative.</p> <p>25 Q. And what FICO representative?</p>



<p style="text-align: right;">Page 70</p> <p>1 the course of life in 2014.</p> <p>2 MR. FLEMING: Okay.</p> <p>3 MR. HINDERAKER: June 30th.</p> <p>4 MR. FLEMING: Lack of foundation, then.</p> <p>5 A. I assume that this is the attachment for</p> <p>6 this e-mail?</p> <p>7 Q. Yes.</p> <p>8 A. I cannot say one way or another because</p> <p>9 the file name is not listed in the document.</p> <p>10 Q. The document doesn't have the file name</p> <p>11 to tell you exactly, right?</p> <p>12 A. Yeah.</p> <p>13 Q. Do you have any reason to believe that</p> <p>14 it's not?</p> <p>15 A. I have no reason to believe any way,</p> <p>16 either way.</p> <p>17 Q. Either way?</p> <p>18 A. Yeah.</p> <p>19 Q. Fair enough.</p> <p>20 So if we go to page 18 entitled Surety</p> <p>21 Bond Services, what that means is a subject for</p> <p>22 somebody else, do we agree?</p> <p>23 A. Correct.</p> <p>24 Q. And then on page 19, I just want to</p> <p>25 point out, it says the booking system for U.S.,</p>	<p style="text-align: right;">Page 72</p> <p>1 understanding in that regard?</p> <p>2 A. It does not. It says application itself</p> <p>3 was installed on U.S. servers which confirm what I</p> <p>4 said before.</p> <p>5 Q. Okay.</p> <p>6 (Exhibit 16, Chubb Arch PLD Project</p> <p>7 Statement of Work, marked for identification, as of</p> <p>8 this date.)</p> <p>9 THE VIDEOGRAPHER: The time is</p> <p>10 11:11 a.m. and we are going off the record.</p> <p>11 (Discussion off the record.)</p> <p>12 THE VIDEOGRAPHER: The time is</p> <p>13 11:19 a.m. and we're back on the record.</p> <p>14 BY MR. HINDERAKER:</p> <p>15 Q. Did I give you Exhibit 16? You have it.</p> <p>16 The court reporter gave it to you. Good. All right.</p> <p>17 Are you familiar with this document from</p> <p>18 days gone by?</p> <p>19 A. I'm not.</p> <p>20 Q. All right. Do you know who or what</p> <p>21 AppCentrica is?</p> <p>22 A. It's an IT window providing services to</p> <p>23 Chubb.</p> <p>24 Q. IT vendor?</p> <p>25 A. IT vendor.</p>
<p style="text-align: right;">Page 71</p> <p>1 Canada and Australia. And then on page 20, it says</p> <p>2 rules validation via Blaze. Under fact sheet, it</p> <p>3 says rules validation via Blaze.</p> <p>4 Do you know one way or the other whether</p> <p>5 Blaze Advisor software was installed on servers in</p> <p>6 Australia to support surety bond services?</p> <p>7 A. No, I believe surety bond services was</p> <p>8 installed in the U.S. servers.</p> <p>9 Q. Do you know that Australian -- the</p> <p>10 people in Australia accessed that application from</p> <p>11 Australia to the U.S. servers?</p> <p>12 A. I don't know that.</p> <p>13 Q. One way or the other?</p> <p>14 A. One way or another.</p> <p>15 Q. Okay.</p> <p>16 A. Only speak to the technical fact that</p> <p>17 that was installed in U.S., on U.S. servers.</p> <p>18 Q. All right. So whether it was used in</p> <p>19 Australia, you don't know one way or the other?</p> <p>20 A. No.</p> <p>21 Q. Because earlier you told us that to your</p> <p>22 best knowledge, Blaze Advisor software was not</p> <p>23 installed in Australia?</p> <p>24 A. Correct.</p> <p>25 Q. So does this information change your</p>	<p style="text-align: right;">Page 73</p> <p>1 Q. All right. And do you know what Chubb</p> <p>2 Arch PLD Project means?</p> <p>3 A. It means that it's a Chubb architecture</p> <p>4 physical analogical design document. It's just the</p> <p>5 name of the template for the document.</p> <p>6 Q. Physical analogical design. All right.</p> <p>7 A. Yeah. Unless I'm mistaken, the PLD</p> <p>8 architect -- let me rephrase it. I'm not familiar</p> <p>9 with the PLD acronym.</p> <p>10 Q. But your best understanding, that's what</p> <p>11 you think it means, correct?</p> <p>12 A. Yeah.</p> <p>13 Q. All right. It's not -- let me direct</p> <p>14 your attention to the third page. And we can just</p> <p>15 read together that the document provides a statement</p> <p>16 of work for the Evolution engagement in 2015 and 2016</p> <p>17 between the vendor, AppCentrica and Chubb Insurance</p> <p>18 Company of Canada, agreed?</p> <p>19 A. Agreed.</p> <p>20 Q. And what is Evolution?</p> <p>21 A. It is the name of the policy</p> <p>22 administration system used in Canada.</p> <p>23 Q. Okay. And this document goes on to say</p> <p>24 "The focus of the work," and then I'll skip a few</p> <p>25 words, "over the next two years will be the design</p>